



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 10, 2022

By Email and USAFx

Kevin K. Tung
c/o Kevin Kerveng Tung PC
136-20 38th Avenue, Suite 3D
Flushing, New York 11354

Re: United States v. Yong Zhu
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Department of Homeland Security Records regarding international travel	YZ-005129	YZ-005164
Recording of interview	YZ-006144	YZ-006144
Department of State Records	YZ-005165	YZ-005368
TD Bank records	YZ-005369	YZ-005755
Navy Federal Credit Union records	YZ-005756	YZ-005987
Department of Homeland Security Records	YZ-005988	YZ-005990
Copies of Interpol Red Notices	YZ-005991	YZ-006003

Description	Begin Bates	End Bates
Handwritten notes	YZ-006004	YZ-006005
New York Department of State records	YZ-006006	YZ-006118
New York Department of State records	YZ-006119	YZ-006133
Audio recording	YZ-006134	YZ-006134
Reports associated with data from search warrant No. 20-MC-2113	YZ-006135	YZ-006135
Apple records	YZ-006136	YZ-006136
AT&T records	YZ-006137	YZ-006137
Paypal records	YZ-006138	YZ-006138
T-Mobile records	YZ-006139	YZ-006139
T-Mobile records	YZ-006140	YZ-006140
T-Mobile records	YZ-006141	YZ-006141
Yahoo, Inc. records	YZ-006142	YZ-006142
Yahoo, Inc. records	YZ-006143	YZ-006143

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers the materials marked produced today that have been marked “SENSITIVE” to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)